

EXHIBIT B

Esposito Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

**DECLARATION OF ROB ESPOSITO IN SUPPORT OF
FTX RECOVERY TRUST'S ONE HUNDRED SEVENTY-FIRST
(NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN CLAIMS FILED
AGAINST THE INCORRECT DEBTOR**

I, Rob Esposito, hereby declare under penalty of perjury:

1. I am a Senior Director at Alvarez & Marsal North America, LLC (“A&M”), a restructuring advisory services firm specializing in interim management, crisis management, turnaround consulting, operational due diligence, creditor advisory services and financial and operation restructuring.
2. I have more than 15 years of restructuring experience across various industries, including broadcasting, oil & gas, manufacturing, pharma, transportation, automotive, retail, telecommunications, and healthcare.
3. Since joining A&M, I have been involved in numerous Chapter 11 restructurings, including Alpha Natural Resources, Sandridge Energy, Westmoreland Coal,

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

Endo International, Cumulus Media, Coach America, Cooper-Standard Automotive, Ascena Retail and Exide Technologies.

4. I submit this declaration (the “Declaration”) in support of the *FTX Recovery Trust’s One Hundred Seventy-First (Non-Substantive) Omnibus Objection to Certain Claims Filed Against the Incorrect Debtor* (the “Objection”).² I am not being compensated separately for this testimony other than through payments received by A&M as financial advisor retained by the FTX Recovery Trust.

5. Except as otherwise indicated herein, all of the facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me by the FTX Recovery Trust’s management, the FTX Recovery Trust and other Debtor professionals, including the A&M team, involved in advising the Debtors and the FTX Recovery Trust in the above-captioned case (the “Chapter 11 Case”). If called upon to testify, I could and would testify to the facts set forth herein on that basis. I am authorized to submit this Declaration on behalf of the FTX Recovery Trust.

6. The Incorrect Debtor Claims subject to the Objection were reviewed and analyzed in good faith using due diligence by appropriate personnel of the FTX Recovery Trust, A&M, and the Claims Agent. Indeed, the FTX Recovery Trust and its advisors have spent months reviewing and analyzing proofs of claim and any supporting documentation filed against the FTX Recovery Trust. These efforts resulted in, among other things, identifying the Incorrect Debtor Claims set forth in Schedule 1 to Exhibit A of the Objection.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

7. Based on the FTX Recovery Trust's and its advisors' ongoing analysis and review, the FTX Recovery Trust and its advisors have determined that each of the Incorrect Debtor Claims listed on Schedule 1 to the Order is a claim for which the claimant seeks recovery of amounts for which the asserted Debtor has no record of liability in its books and records, and such claims should be filed in the estate of a different Debtor that is the subject of such claim.

8. Accordingly, based upon my review of the Incorrect Debtor Claims subject to the Objection, I believe that revising the Incorrect Debtor Claims to the Modified Claims on the claims register is in the best interests of the FTX Recovery Trust and its creditors.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: April 28, 2025

/s/ Rob Esposito

Rob Esposito
Alvarez & Marsal North America, LLC
Senior Director